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April 28, 2023

VIA ECF

The Honorable Vernon S. Broderick  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED**

**SO ORDERED** 

**VERNON S. BRODERICK**

**U.S.D.J.** 05/01/2023

By May 12, 2023 the parties shall file their joint letter and proposed case management plan in accordance with the Order and Notice of Initial Conference. (Doc. 11.)

Re: Fernchurch Consulting, L.L.C. v. Bank of America Corporation, et al  
23 Civ. 2379 (VSB)

Dear Judge Broderick:

I represent the plaintiff in the above-referenced matter.

I write to respectfully request that Your Honor extend the time for the parties to comply with the directives set forth within the Court's "*Order and Notice of Initial Conference*" dated March 29, 2023.

The reason for the instant application is that I did not become aware of said Order (and the subsequent "Order" dated April 24, 2023) until literally a few minutes ago when, having not received any communications from the Court<sup>1</sup>, I checked the docket and found out that the Court had issued the above-referenced Orders.

Upon my review of the docket and above-referenced Orders, I immediately called my adversary, namely Shan Massand, Esq. He informed me that he was aware of the Court's prior Orders but did not contact me because it was not his job to do so.

It will be impossible at this late juncture for the parties to comply with the Court's directive(s) of March 29, 2023 and April 24, 2023 today.

Based upon the foregoing, I respectfully request that the Court extend the time for the parties to comply with the Court's March 29, 2023 Order to May 12, 2023. Mr. Massand consents to this request.

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<sup>1</sup> The docket does not list any contact information for my firm, which likely explains why I have not received any of the communications from the Court.

I thank the Court for its attention to, and consideration of this matter.

Respectfully submitted,

/s/

Wale Mosaku

AM/ms

Encl.

cc: Shan Massand, Esq. (via ECF)